

DIXVILLE TELEPHONE COMPANY A DIVISION OF TILLOTSON CORPORATION ONE CRANBERRY HILL, SUITE 105, LEXINGTON, MA 02421

PHONE: 781-402-1731 FAX: 781-402-1737

March 2, 2009

Commission's Secretary
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12<sup>th</sup> Street, SW
Washington, DC 20554

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 2, 2009

Name of company covered by this certification: Dixville Telephone Company ("Dixtelco")

Form 499 Filer ID: 809726 Name of signatory: Ann C. Walsh

Title of signatory: Duly Elected Assistant Secretary

I, Ann C. Walsh, certify that I am an officer of Dixville Telephone Company, and acting as an agent of Dixtelco, that I have personal knowledge that Dixtelco has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Dixtelco's procedures ensure Dixtelco is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Dixtelco has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

Dixtelco has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Ann C. Walsh

Signed Conn (

**Duly Elected Assistant Secretary** 

Dixville Telephone Company

Cc: Deliver via e-mail to fcc@bcpiweb.com

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## DIXVILLE TELEPHONE COMPANY STATEMENT OF CPNI COMPLIANCE PROCEDURES

Dixtelco does not use CPNI information for its own or for any affiliated company marketing efforts, nor does it disclose CPNI to any third party for marketing purposes.

Although there are no plans to ever do so, should Dixtelco decide to use CPNI in its marketing efforts, it will conform to Federal Communications Commission Rules regarding the use and safeguarding of CPNI, including but not limited to rules regarding customer notice and approval, opt-in and opt-out procedures, the tracking of approval status, and CPNI usage.

As permitted by the CPNI rules, Dixtelco may use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Dixtelco, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex-like features.

While Dixtelco occasionally shares CPNI with third parties solely to provide services to its customers, Dixtelco does not share, sell, lease or otherwise provide CPNI to any third party for the purposes of marketing any services.

All Dixtelco personnel who have access to CPNI receive training about CPNI compliance. Specifically, all new personnel are provided with CPNI training at new-hire orientation that is based upon the policies and procedures set forth in Dixtelco's CPNI Policy. Moreover, a summary of Dixtelco's CPNI policies are included in its CPNI Compliance Manual. All personnel are required to acknowledge they have read and understand the information in the CPNI Compliance manual.

All Dixtelco personnel are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by Dixtelco. Personnel who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI are subject to discipline, which may include termination.

Dixtelco has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Dixtelco will notify affected customers. Dixtelco will maintain a record of any CPNI-related breaches for a period of at least two years.

If the proper approved legal documents, including an approved Court Order, are received by the Dixtelco, Dixtelco will provide law enforcement or the appropriate legal entity with the requested information only after determining that the request is in compliance with all necessary laws and/or regulations. Ann Walsh, Assistant Secretary retains requests of this type under lock for a period of at least five years. Dixtelco has never received a request of this type.